

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JAMES CONNOLLY, Individually and On
Behalf of All Others Similarly Situated,

Plaintiffs,

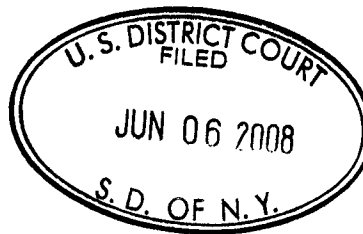
v.

AMERICAN INTERNATIONAL GROUP,
INC., MARTIN J. SULLIVAN, STEVEN J.
BENSINGER, JOSEPH J. CASSANO,
ROBERT E. LEWIS, and DAVID L.
HERZOG,

Defendants.

CIVIL ACTION NO. 08-cv-5072

NOTICE OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE*



NOTICE OF MOTION AND MOTION TO ADMIT COUNSEL *PRO HAC VICE*

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, Robert J. Shapiro, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

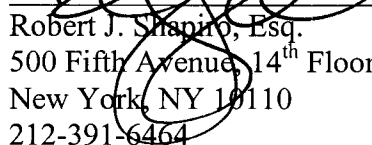
Applicant's Name: Sean M. Handler
Firm Name: Schiffrin Barroway Topaz & Kessler, LLP
Address: 280 King of Prussia Road
City/State/Zip: Radnor, PA 19087
Phone Number: (610) 667-7706
Fax Number: (610) 667-7056
Email Address: shandler@sbtklaw.com

Sean M. Handler is a member in good standing of the Bar of the State of Pennsylvania. There are no pending disciplinary proceedings against Sean M. Handler in any State or Federal Court.

Dated: 6/5, 2008

Respectfully submitted,

THE SHAPIRO FIRM, LLP



Robert J. Shapiro, Esq.
500 Fifth Avenue, 14th Floor
New York, NY 10110
212-391-6464

Local Counsel for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JAMES CONNOLLY, Individually and On
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

AMERICAN INTERNATIONAL GROUP,
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**AFFIDAVIT OF ROBERT J. SHAPIRO IN
SUPPORT OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

State of New York)
) ss.
County of New York)

Robert J. Shapiro, being duly sworn, hereby deposes and says as follows:

1. I am a partner at The Shapiro Firm, LLP, Local Counsel for the Plaintiff in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of the Plaintiffs' motion to admit Sean M. Handler as counsel *pro hac vice* to represent the Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on 6/22/94. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Mr. Handler is a partner at Schiffrin Barroway Topaz & Kessler, LLP in Radnor, Pennsylvania.

4. I have found Mr. Handler to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

5. Accordingly, I am pleased to move the admission of Sean M. Handler, *pro hac vice*.

6. In compliance with Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I have attached a Certificate of Good Standing for Mr. Handler from Pennsylvania issued within the past thirty days.


7. I respectfully submit a proposed order granting the admission of Sean M. Handler, *pro hac vice*, which is also attached.

WHEREFORE it is respectfully requested that the motion to admit Sean M. Handler, *pro hac vice*, to represent the Plaintiff in the above-captioned matter, be granted.

Dated: 6/5, 2008

Respectfully submitted,

THE SHAPIRO FIRM, LLP


Robert J. Shapiro, Esq.
500 Fifth Avenue, 14th Floor
New York, NY 10110
212-391-6464

Local Counsel for Plaintiff

Sworn to and subscribed before me

this 5th day of June, 2008.


Notary Public

LEONARD N. SHAPIRO
NOTARY PUBLIC, STATE OF NEW YORK
NO. 31-8938796
QUALIFIED IN NEW YORK COUNTY
COMMISSION EXPIRES JULY 28, 2009

CERTIFICATE OF SERVICE

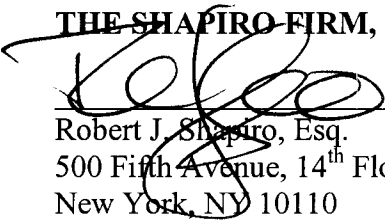
I, Robert J. Shapiro, hereby certify that I filed true and correct copies of the foregoing documents:

- *PRO HAC VICE* MOTION, AFFIDAVIT, AND PROPOSED ORDER.

with the Clerk of the Court on this date. The CM/ECF system will send notification to all participants registered for CM/ECF; those listed on the attached Service List not registered for CM/ECF will receive notification via first-class mail.

Dated: 6/5, 2008

THE SHAPIRO FIRM, LLP



Robert J. Shapiro, Esq.
500 Fifth Avenue, 14th Floor
New York, NY 10110
212-391-6464

Local Counsel for Plaintiff

SERVICE LIST

American International Group, Inc.
70 Pine Street
New York NY 10270

Robert F. Carangelo, Esq.
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153

Incoming Attorneys for Defendants



Supreme Court of Pennsylvania

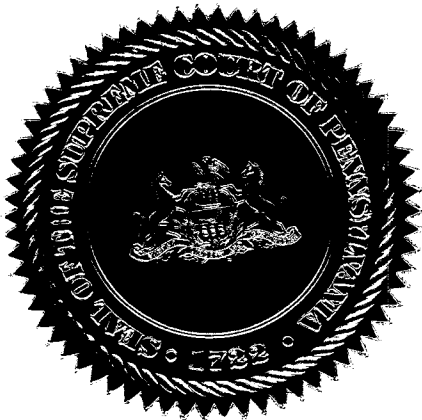
CERTIFICATE OF GOOD STANDING

Sean M. Handler, Esq.

DATE OF ADMISSION

January 10, 2001

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: June 3, 2008

A handwritten signature in black ink, appearing to read 'John W. Person, Jr.'.

John W. Person, Jr., Esq.
Deputy Prothonotary

UNITED STATES DISTRICT COURT
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**ORDER FOR ADMISSION *PRO HAC*
VICE ON WRITTEN MOTION**

Upon the motion of Robert J. Shapiro, Local Counsel for the Plaintiff, and said sponsor attorney's affirmation in support;

IT IS HEREBY ORDERED that

Applicant's Name:	Sean M. Handler
Firm Name:	Schiffirin Barroway Topaz & Kessler, LLP
Address:	280 King of Prussia Road
City/State/Zip:	Radnor, PA 19087
Phone Number:	(610) 667-7706
Fax Number:	(610) 667-7056
Email Address:	shandler@sbtclaw.com

is admitted to practice *pro hac vice* as counsel for the Plaintiff in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system,

counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: _____

Richard J. Sullivan, U.S. District Judge